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June 28, 2004

By Hand Delivery

Marlene Dortch, Esquire

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

RE: ET Docket No. 04-186; ET Docket No. 02-380
Ex Parte Presentation - Pappas Telecasting Companies

Dear Ms. Dortch:

On behalf of Pappas Telecasting Companies ("Pappas"), this letter is being submitted in support of the Request for Clarification filed by The Association for Maximum Service Television ("MSTV") in the above-referenced proceedings on June 21, 2004.

As stated previously, Pappas remains very concerned about the introduction of unlicensed devices in the broadcast television spectrum.¹ This concern is supported by parties in other proceedings who have raised serious concerns about the viability of such operations, and the ability of the unlicensed devices to avoid causing interference to existing, licensed services. In addition, Pappas does not believe that the Commission should introduce this new service into the broadcast spectrum during the transition from analog to digital operations. Since these unlicensed devices have not yet been developed, and the DTV transition is certain to expose unforeseen interference issues among digital television licensees, the introduction of a new service operating in the same spectrum would raise many unnecessary problems that could undermine the DTV transition. To this end, Pappas fully intends to file comments in response to the Notice of Proposed Rulemaking issued in this proceeding.

However, the issues raised by MSTV must be resolved before a meaningful debate can be established. Pappas agrees with MSTV that there are many factors that could shape the substance of the debate that have been left out from the NPRM. For example, without knowing the bandwidth of the proposed services, it is exceedingly difficult to determine the impact that such services would have on digital television operations. Also important is receiving guidance on the appropriate signal levels to be used in consideration of whether "white spaces" exist. Pappas agrees that this information, along with the type of modulation that these devices would use, is crucial for parties to consider when preparing comments in this proceeding.

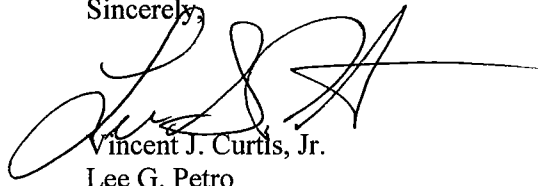
¹ See *Comments of Alaska Broadcasters Association, et. al.*, filed March 17, 2003, in ET Docket 02-380.

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Therefore, Pappas urges the Commission to give full consideration to the Request for Clarification on an expedited basis, and provide the public further guidance prior the initial comment filing date. If necessary, Pappas supports the extension of the initial comment date so that the parties can fully consider the supplementary information provided by the Commission.

Pappas believes that this matter is far too important, and will have a tremendous impact on the DTV transition, to leave any matters unresolved. Pappas appreciates MSTV's leadership in this matter, and expectantly awaits further guidance from the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "V. J. Curtis, Jr.", with a long horizontal flourish extending to the right.

Lee G. Petro

Counsel for Pappas Telecasting Companies

Enclosure

cc: David Donovan, President
Association for Maximum Service Television, Inc.

Jonathan D. Blake, Esquire
Counsel for Association for Maximum Service Television, Inc.